

**FILED**  
DISTRICT COURT OF GUAM

DEC 02 2021 *Cme*

**JEANNE G. QUINATA**  
CLERK OF COURT

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6 Attorneys for the United States of America

7 IN THE UNITED STATES DISTRICT COURT

8 FOR THE TERRITORY OF GUAM

9 UNITED STATES OF AMERICA,

CRIMINAL CASE NO. 17-00032

10 Plaintiff,

**UNITED STATES' APPLICATION TO  
UNSEAL THE INDICTMENT**

11 vs.

12 KUAN JEH TSAO,

13 Defendant.

14 COMES NOW, the United States of America, by and through its undersigned counsel, and  
15 hereby moves this Honorable Court for an Order unsealing the Indictment (ECF No. 1), in the  
16 above-captioned case, as there is no further reason to keep the document sealed.

17 RESPECTFULLY SUBMITTED this 2nd day of December, 2021.

18  
19 SHAWN N. ANDERSON  
United States Attorney  
Districts of Guam and NMI

20  
21 By:

*Stephen F. Leon Guerrero*  
22 STEPHEN F. LEON GUERRERO  
Assistant U.S. Attorney  
23  
24